



NATIONAL CONFERENCE *of* STATE LEGISLATURES

*The Forum for America's Ideas*

The Honorable Thomas Wheeler  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Curtis Bramble**  
*Senate President Pro Tempore  
Utah  
President, NCSL*

**Karl Aro**  
*Director of Administration  
Department of Legislative Services  
Maryland  
Staff Chair, NCSL*

**William T. Pound**  
*Executive Director*

Re: Proposed Merger Between Charter Communications and Time Warner Cable (MB Docket No. 15-149)

Dear Chairman Wheeler:

I write to you today on behalf of the National Conference of State Legislatures to express our support for the proposed merger between Charter Communications and Time Warner Cable. As you know, Charter is mainly a rural cable company, with its headquarters in St. Louis, Missouri. Despite the majority of Charter's customers being in rural areas, they enjoy an average speed of roughly 60mbps, the lowest tier package offered by Charter. That's nearly 6 times faster than the average speed in the United States, and more than twice as fast as the Federal Communications Commission's (FCC) new standard for broadband, 25mbps.

As a result of the merger, Charter will absorb Time Warner's subscribers, thereby allowing them access to considerably higher internet speeds for no additional cost. We believe that this is squarely in the public interest. Additionally, thanks to their recent subscriber uptick, their faster internet speeds, and their commitment to expanding Wi-Fi in public places, Charter has been recognized by the cable industry as being the best provider in the nation. Expanding the Charter umbrella only further expands their capability to offer a superior product and experience to more Americans.

Lastly, we do not believe that the proposed merger would present any significant antitrust concerns. The transaction before the commission involves two parties who do not produce any content that would travel over its combined network, leaving the proposed new parent company, New Charter, free from any potential internal network management conflicts. Considering the FCC's interest in ensuring "reasonable and timely" deployment of broadband networks under Section 706 of the 1996 Telecommunications Act, it appears it would be incumbent upon the Commission to grant approval of this transaction.

Sincerely,

William Pound  
Executive Director, NCSL